

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION**

GRAND JUROR DOE,)	
)	
Plaintiff,)	
)	
v.)	Case 4:15-cv-6-RWS
)	
ROBERT P. MCCULLOCH, in his)	
official capacity as Prosecuting)	
Attorney for St. Louis County,)	
Missouri,)	
)	
Defendant.)	

DEFENDANT’S MOTION TO DISMISS

Defendant Robert P. McCulloch (“McCulloch”), by and through counsel, hereby moves for dismissal of Plaintiff Doe’s (“Doe”) complaint. McCulloch is entitled to judgment in his favor based upon the doctrines of claim preclusion and issue preclusion. In addition, the Court lacks jurisdiction, and, even if it does not lack jurisdiction, Doe’s claim fails because it is without merit.

In support of this motion, McCulloch submits his memorandum in support contemporaneously herewith, and incorporates it herein by reference.

WHEREFORE, McCulloch respectfully requests that the Court grant this motion; enter an order dismissing Doe’s complaint with prejudice; and grant such other and further relief as the Court deems just and proper herein.

Respectfully submitted,

JOSHUA D. HAWLEY,
Attorney General

/s/ Andrew D. Kinghorn

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McCulloch*

CERTIFICATE OF SERVICE

I hereby certify that on this 17th day of September, 2018, the foregoing was filed electronically with the Court to be served upon all parties by operation of the Court's electronic filing system.

/s/ Andrew D. Kinghorn
Andrew D. Kinghorn
Assistant Attorney General